

VIA UPS

Eric F. Pastor
Pastor, Behling & Wheeler, LLC
2201 Double Creek Drive, Suite 4004
Round Rock, TX 78664

Re: Gulfco Marine Maintenance Superfund Site, Freeport, Texas
Unilateral Administrative Order, CERCLA Docket No. 06-05-05A
Draft Remedial Investigation Report

Dear Mr. Pastor,

The Environmental Protection Agency (EPA) and the Texas Commission on Environmental Quality (TCEQ) have performed a review of the above referenced document dated February 4, 2011. The enclosed comments shall be incorporated in the Final Remedial Investigation Report and copies provided to the notification list within thirty (30) days of receipt of this letter.

If you have any questions, please contact me at (214) 665-8318, or send an e-mail message to miller.garyg@epa.gov.

Sincerely yours,

Gary Miller, P.E.
Remediation Project Manager

Enclosure

cc: Luda Voskov (TCEQ)

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Comments

Draft Remedial Investigation (RI) Report, dated February 4, 2011

1. (Executive Summary): This section details the media evaluated for the site but does not discuss the analysis of the fish that was conducted. A summary of the fish ingestion pathway analysis shall be included in this section as a medium of concern that was investigated for the site.
2. (Executive Summary): The executive summary shall include a discussion of deed restrictions per the assumptions of the Baseline Human Health Risk Assessment (BHHRA).
3. (Executive Summary, p. 4; and Section 8, Conclusions, p. 99): In the “Groundwater” subsection, the sentence “The extent of VOCs exceeding extent evaluation comparison values was generally limited to a localized area...” shall be revised to: “The extent of VOCs exceeding extent evaluation comparison values **and Dense Non-Aqueous Phase Liquid (DNAPL)** was generally limited to a localized area...”
4. (Executive Summary, p. 4; and Section 8, Conclusions, p. 99): Although the groundwater classification as a Class 3 based on the salinity and groundwater usage has been mentioned in the Report, it shall also be included in the Executive Summary and in Section 8.
5. (Section 2.4, p. 24): The section regarding the South Area shall include a reference to the draft Removal Action Report in that it describes the conditions relating to the tank removal action and sampling results.
6. (Section 4.6.1, p. 74; Section 4.6.2, p. 76; and Section 8.0, p. 99): Dense non-aqueous phase liquids (DNAPL) are present, although its significance is not developed. DNAPL dissolution is mentioned as a “possible mechanism by which groundwater may impacted” in fate and transport Section 5.3.3 (p. 84). DNAPL is not a “possible mechanism,” rather it is the predominant issue regarding sourcing of chemicals of interest to ground water pathways. The referenced sections shall include a discussion of DNAPL (including chemical concentrations in ground water compared to their solubility, and boring log results regarding staining, NAPL sheen, etc.), and its significance as a source of contamination to the ground water.
7. (Section 6.0, p. 92-94): The conclusions of the Baseline Human Health Risk Assessment (BHHRA) were based on the limitations of human contact through deed restrictions. This shall be discussed in the BHHRA summary.

8. (Section 6.0, p. 92-94): The summary of the BHHRA includes a synopsis of the exposure assessment, toxicity assessment and risk characterization, but does not include a conclusion section. A conclusion section shall be added for clarification.
9. (Section 7.0, p. 96): The RI Report discusses ecological risks for the site. Because an approved Baseline Ecological Risk Assessment (BERA), which is not final at this time, will be the ultimate determination of ecological risks at the site, a statement shall be included that the approved BERA will determine the actual ecological risks for the site, and any BERA findings that are not consistent with statements in this RI Report will be addressed as appropriate either in the Final RI Report (if the BERA is approved in time for the Final RI Report) or the Feasibility Study.
10. (Section 8.0, p. 97): Impacts to sediment and soil refer to “certain PAHs.” For clarity and emphasis, the RI Report shall indentify the PAHs detected as “carcinogenic PAHs” for human health pathways where this is the case.
11. (Section 8.0, p. 100): The RI Report states that “...*the primary ground water COI plume areas exhibit generally stable or declining trends.*” While this is generally true, it has not been demonstrated in the area of monitoring well ND3MW02 (southwest corner of former surface impoundment). The PCE and TCE trends shown on Figures 72 and 73 are significantly increasing at ND3MW02 from 2006 to 2008, which does not support this statement. However, ND3MW02 is completed in DNAPL as indicated by the boring log (visible DNAPL at 21-feet), so a declining trend there is unlikely. The RI Report shall clarify the statement regarding stable or declining trends with a discussion of the area around ND3MW02.